



POLICE DEPARTMENT

In the Matter of the Disciplinary Proceedings : X

- against - : FINAL

Lieutenant Steven Li : ORDER

Tax Registry No. 933930 : OF

Bronx Court Section : DISMISSAL

X

Lieutenant Steven Li, Tax Registry No. 933930, having been served with written notice, has been tried on written Charges and Specifications numbered 2023-29580, as set forth on form P.D. 468-121, dated January 4, 2024 (amended on January 22, 2024), and after a review of the entire record, Respondent is found Guilty of Specifications 3 and 5, and Not Guilty of Specifications 1, 2, and 4.

Now therefore, pursuant to the powers vested in me by Section 14-115 of the Administrative Code of the City of New York, I hereby DISMISS Lieutenant Steven Li from the Police Service of the City of New York.

HONORABLE EDWARD A. CABAN
POLICE COMMISSIONER

EFFECTIVE: 2/16/24



POLICE DEPARTMENT

February 9, 2024

X

In the Matter of the Charges and Specifications : Case No.
- against - : 2023-29580
Lieutenant Steven Li :
Tax Registry No. 933930 :
Bronx Court Section :

X

At: Police Headquarters
One Police Plaza
New York, NY 10038

Before: Honorable Jeff S. Adler
Assistant Deputy Commissioner Trials

APPEARANCES:

For the Department: Javier Seymore and Daniel Maurer, Esqs.
Department Advocate's Office
One Police Plaza, Room 402
New York, NY 10038

For the Respondent: Peter Brill, Esq.
Brill Legal Group, P.C.
176 Lexington Avenue, Suite O
New York, NY 10016

To:

HONORABLE EDWARD A. CABAN
POLICE COMMISSIONER
ONE POLICE PLAZA
NEW YORK, NY 10038

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CHARGES AND SPECIFICATIONS

1. Said Lieutenant Steven Li, while assigned to the Internal Affairs Bureau, on or about and between December 1, 2019 and October 22, 2020, wrongfully engaged in conduct prejudicial to the good order, efficiency, or discipline of the Department, to wit: said Lieutenant did knowingly combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit: acting as an agent of a foreign government, to wit: the People's Republic of China, without prior notification to the Attorney General of the United States, as required by law.

18 U.S.C. §§ 371 and 3238

**CONSPIRACY TO ACT AS
AN AGENT OF FOREIGN
GOVERNMENTS WITHOUT
NOTIFYING THE
ATTORNEY GENERAL**

A.G. 304-06, Page 1, Paragraph 1

**PROHIBITED CONDUCT
GENERAL REGULATIONS**

2. Said Lieutenant Steven Li, while assigned to the Internal Affairs Bureau, on or about and between December 1, 2019 and October 22, 2020, wrongfully engaged in conduct prejudicial to the good order, efficiency, or discipline of the Department, to wit: said Lieutenant did knowingly act in the United States as an agent of a foreign government, to wit: the People's Republic of China, without prior notification to the Attorney General of the United States, as required by law.

18 U.S.C. § 951(a)

**ACTING AS AN AGENT OF
A FOREIGN GOVERNMENT
WITHOUT NOTIFYING THE
ATTORNEY GENERAL**

A.G. 304-06, Page 1, Paragraph 1

**PROHIBITED CONDUCT
GENERAL REGULATIONS**

3. Said Lieutenant Steven Li, while assigned to the Internal Affairs Bureau, on or about and between April 29, 2021 and September 25, 2021, wrongfully engaged in conduct prejudicial to the good order, efficiency, or discipline of the Department, to wit: in a matter within the jurisdiction of the Executive Branch of the Government of the United States, Lieutenant Li knowingly and willfully did make materially false, fictitious, and fraudulent statements and representation to federal law enforcement officers.

18 U.S.C. § 1001

STATEMENTS

A.G. 304-06, Page 1, Paragraph 1

**PROHIBITED CONDUCT
GENERAL REGULATIONS**

4. Said Lieutenant Steven Li, while assigned to the Internal Affairs Bureau, on or about and between December 1, 2019 and September 25, 2021, with intent to obtain a benefit or deprive another person of a benefit, said Lieutenant committed an act relating to his office but constituting an unauthorized exercise of his official functions, knowing that such act is unauthorized and knowingly refrains from performing a duty which is imposed upon him by law or is clearly inherent in the nature of his office, to wit: said Lieutenant failed to take police action to impartially enforce the law and render assistance and aid to a person who was identified as a target of Operation Fox Hunt. *(As amended)*

N.Y. Penal Law § 195.00(1), (2)

OFFICIAL MISCONDUCT

A.G. 304-06, Page 1, Paragraph 1

PROHIBITED CONDUCT
GENERAL REGULATIONS

5. Said Lieutenant Steven Li, while assigned to the Internal Affairs Bureau, on or about and between April 29, 2021 and November 15, 2023, after being made aware that he was wrongfully engaged in conduct prejudicial to the good order, efficiency, or discipline of the Department, to wit: associating with a criminal target in an FBI investigation, failed to report his misconduct to his supervisor as required. *(As amended)*

P.G. 207-21

ALLEGATIONS OF
CORRUPTION AND
OTHER MISCONDUCT
AGAINST MOS

REPORT AND RECOMMENDATION

The above-named member of the Department appeared before me on February 2, 2024.

Respondent, through his counsel, entered a plea of Not Guilty to the subject charges. The Department called Lieutenant Daniel Cutter of the NYPD's Internal Affairs Bureau as a witness, and introduced into evidence multiple exhibits reflecting the interactions between the parties in this matter. Respondent testified on his own behalf. A stenographic transcript of the trial record has been prepared and is available for the Police Commissioner's review. Having evaluated all of the evidence in this matter, I find as follows:

Specifications 1 & 2 (acting as agent): Not Guilty

Specification 3 (false statements): Guilty

Specification 4 (official misconduct): Not Guilty

Specification 5 (failure to report): Guilty.

Recommended penalty: Termination.

ANALYSIS

The evidence presented at this trial established that in or about July 2014, the government of the People's Republic of China ("PRC") commenced a worldwide initiative to forcibly repatriate PRC citizens living in other countries who are wanted in the PRC for allegedly committing crimes. That initiative, known as "Operation Fox Hunt," is overseen by the PRC's Central Commission for Discipline Inspection ("CCDI"), an organ of the Chinese Communist Party. Through this campaign, individuals working at the direction of the CCDI pressure Chinese nationals located in countries such as the United States to return to the PRC to face charges, or to otherwise reach financial settlements with the government of the PRC. Operation Fox Hunt circumvents the internationally recognized procedures in place for dealing with these situations, such as working lawfully through the International Criminal Police Organization ("Interpol"). (Dept. Ex. 1; Tr. 63-64)

One such target of Operation Fox Hunt was a woman named ██████████ ("Huang"), who in 2001 moved to the United States from the PRC, where she had been working for a state-owned agency. In 2002, the PRC accused ██████████ of having stolen money from the company, and using it to purchase various properties in China. The PRC seized those properties, which became the subject of an ongoing dispute between the Chinese government and ██████████ that has spanned several years. In an effort to pressure ██████████ to resolve that dispute, it is alleged that the PRC, in late 2019, dispatched an individual named Sun Hoi Ying ("Sun") to the United States. (Dept. Ex. 1; Tr. 68-70)

It is undisputed that upon his arrival to the United States in December 2019, Sun enlisted the assistance of Respondent in trying to resolve the dispute with [REDACTED]. It also is undisputed that between December 2019 and October 2020, Respondent met and communicated with [REDACTED] regarding this matter on multiple occasions, and that he communicated extensively with Sun as well. At issue is whether in doing so, Respondent was acting as an agent of the government of the PRC, in that he threatened and pressured [REDACTED] under the "direction or control" of the Chinese government. Respondent denies that he was operating as an agent, and maintains that he merely was acting as an intermediary between two sides trying to help resolve their problems. Respondent also faces additional charges, including making materially false statements to representatives of the Federal Bureau of Investigation ("FBI") during interviews on April 29, 2021 and September 25, 2021. The charges will be considered separately.

Specifications 1 & 2 (Acting as an agent)

Specification 1 charges Respondent with conspiring to act as an agent for the government of the PRC, without providing the required notification to the United States Attorney General's Office. Specification 2 is almost identical, except it charges Respondent with acting as an agent as opposed to conspiring to do so. Inasmuch as the Department Advocate's Office ("DAO") did not serve the charges and specifications within the statute of limitations, it must rely on the "criminal exception" to the statute in order to proceed. See N.Y. Civ. Serv. Law § 75(4). Consequently, DAO must prove each of the elements of the relevant provisions of the United States Code to prevail.

At issue is whether DAO has proven, by a preponderance of the credible evidence, that Respondent knowingly acted (or conspired to act) as an agent for the government of the PRC.

The term “agent of a foreign government” is defined as “an individual who agrees to operate within the United States subject to the direction or control of a foreign government or official.” 18 U.S.C. § 951.

[REDACTED] was not called as a witness by DAO. DAO also did not call Special Agent Kelsey Palermo, who led the FBI’s investigation into this matter, and had direct communications with many of the relevant parties. In support of its accusations, DAO instead chose to call only one witness, Lieutenant Daniel Cutter of IAB, and introduced into evidence transcripts and summaries of various meetings and communications between the parties. DAO also introduced into evidence a federal complaint against Sun (Dept. Ex. 1), which alleges that Sun acted as an agent of the PRC in furtherance of Operation Fox Hunt; the federal complaint, which has yet to be adjudicated, also alleges Respondent’s involvement as an unindicted co-conspirator, though Respondent, himself, has never been criminally charged.

In his testimony, Lieutenant Cutter provided the relevant background information regarding Operation Fox Hunt, as summarized above, and essentially reiterated what was told to him by the FBI agents, with reference to the accompanying exhibits. Lieutenant Cutter testified in great detail and precision about the investigation, but his account was double hearsay in nature. Lieutenant Cutter did not, himself, speak with those individuals (other than Respondent) who were interviewed by the FBI during the course of its investigation. As such, his testimony was less probative than if the tribunal had heard directly from [REDACTED], or at least the FBI agent who interacted directly with the parties, particularly in a complex case such as this where many of the conversations were in Chinese and needed to be translated.

As such, the primary evidence in this case comes from the exhibits themselves, as well as the testimony of Respondent. From this evidence, we can reconstruct the interactions between

the parties beginning in December 2019. It is the position of DAO that during the course of these interactions with [REDACTED], Respondent was conspiring with Sun and acting as an agent for the PRC. At trial, Respondent denied this accusation, insisting that he was not operating as an agent of the Chinese government, and was merely trying to mediate a civil dispute involving members of the Chinese community. After listening carefully to Respondent's testimony, and considering it in conjunction with the exhibits in evidence, I find that the evidence was insufficient to persuade this tribunal that Respondent was acting, or conspiring to act, as an agent for the PRC.

On December 1, 2019, Respondent used Sun's telephone to call [REDACTED] in order to set up a meeting to discuss her case. Respondent had just been introduced to Sun that day by an acquaintance of Respondent's, [REDACTED] ("[REDACTED]"). Respondent knew [REDACTED] from community events, and they occasionally had dinner together. Sun and [REDACTED] sought Respondent's help in acting as an intermediary between Sun and [REDACTED] regarding the property dispute. The thought was that since Respondent was a police officer, a position held in high esteem in the Chinese community, [REDACTED] would be more amenable to discussing her case with Sun with Respondent as an intermediary. During that phone call, Respondent did introduce himself as a police officer. (Dept. Exs. 1 & 3; Tr. 185-86, 188-90)

The parties met at a room in a restaurant in Queens that same day. Respondent again introduced himself to [REDACTED], and showed her his police identification in order to verify his position. [REDACTED] agreed to meet with Sun, who joined them in the room. Respondent was in-and-out of the room as the two of them talked about the dispute. During the course of the meeting, Respondent texted [REDACTED] through WeChat as to the status of the meeting, noting at one point that [REDACTED] appeared to be "a little bit emotional," but that she was better now. Respondent

suggested that it might be a good time for [REDACTED], who was in a different part of the restaurant, to "make an appearance," and [REDACTED] did come and join the conversation with [REDACTED]. (Dept. Exs. 1, 2, & 3; Tr. 190-93, 213-15)

At this initial meeting, there was no indication that Respondent pressured [REDACTED] in any way. Rather, he essentially introduced the parties to each other, and then was in and out of the room while the parties discussed their dispute. (Dept. Ex. 3; Tr. 192-93)

Following that meeting, Respondent had extensive communications with Sun through WeChat. In those communications, Respondent provided occasional updates on his interactions with [REDACTED], but they did not discuss the matter in detail. They also had discussions about Respondent and Sun possibly joining together in a "private investigation" business venture at some time in the future. In addition, Sun sent to Respondent attachments containing passport photographs of certain individuals for Respondent to run checks on, though no evidence was presented that Respondent ever opened the attachments, or that he took any investigative actions with respect to those individuals. (Dept. Ex. 4)

In support of its position that Respondent was acting as an agent for the PRC, DAO argues that the prospect of a business relationship served as an inducement for him to act as an agent on behalf of the Chinese government. However, Respondent credibly explained at trial that there was no agreement or understanding that he and Sun were actually going to form such a business partnership; it was merely a possibility that Respondent *might be interested* in at some indefinite time in the future, after his retirement from the NYPD. (Tr. 182-83, 195-96) As such, the evidence presented failed to persuade me that Respondent's discussions about a possible business venture can be fairly construed as constituting a benefit to Respondent designed to secure his agreement to act as an agent for the PRC, or that his efforts at mediating the dispute

were motivated by the prospect of such a benefit. Additionally, Lieutenant Cutter testified that from his investigation, there was no evidence that Respondent received any monetary compensation from Sun or [REDACTED]. (Tr. 148-49)

Two days after her December 1 meeting with Sun, [REDACTED], and Respondent, [REDACTED] notified the FBI about the discussion. She subsequently began working with the FBI investigation into Operation Fox Hunt. [REDACTED] did not have any additional contact with Respondent until the FBI had her arrange a controlled meeting with him in February 2020.

On February 9, 2020, [REDACTED] initiated an in-person meeting with Respondent to discuss her case. That meeting was secretly recorded, a translation of which was introduced into evidence. (Dept. Ex. 6) At the meeting, Respondent and [REDACTED] discussed the status of her ongoing negotiations with Sun. They spoke about the parameters of the dispute in detail. Throughout their conversation, Respondent repeatedly emphasized that he was not on either side of the dispute, and did not "have any stake in this." He suggested that both sides should be willing to compromise in order to resolve the matter. Respondent emphasized that given his job as a police officer, he would not act on behalf of Sun. Rather, his role was only to "pass along" information, and "not be involved further than that." He agreed with [REDACTED] that it would be "unreasonable and impossible" for her to accept a resolution where she gave up all the properties she owned in order to return to China as an innocent person. After reviewing the record in its entirety, I find that the tenor of their conversation was not one where Respondent was pressuring or threatening [REDACTED] on Sun's behalf. (Dept. Ex. 6)

In the months that followed, Respondent and [REDACTED] continued to discuss the status of her case through WeChat. The discussions essentially involved [REDACTED] asking for updates on any progress toward resolving her matter. Respondent suggested that [REDACTED] might be better off

communicating with Chen as the intermediary, but [REDACTED] expressed a reluctance to do so. Again, this tribunal finds that Respondent did not appear to be pressuring [REDACTED] to give in to Sun's demands. He reiterated that he was "an outsider" who was simply offering his thoughts, since he "did not know about the matters too deeply." In fact, Respondent explicitly reminded [REDACTED] that "what offer you feel is acceptable, and what is unacceptable, that's your business." (Dept. Exs. 5 & 7)

On October 22, 2020, Respondent and [REDACTED] had their final meeting, which also was secretly recorded by the FBI. A translation of their conversation, during which they continued to discuss [REDACTED]'s case, was admitted into evidence. (Dept. Ex. 8) The dispute was discussed more extensively, including the role of the Chinese government (i.e. the CCDI) in the matter. Still, Respondent continued to remind [REDACTED] that he was "not speaking on behalf of those people." He also stated that he was not speaking in favor of China, and "this thing doesn't affect him; he just wishes this matter be resolved for [REDACTED] soon." Respondent complained to [REDACTED] that both she and Sun "have been ambiguous, which, being in the middle, makes it difficult for [Respondent] to know their true intentions." Respondent reiterated that it would be best for [REDACTED] and Sun "to have a direct conversation." He concluded the meeting by suggesting that the best path for a resolution was one where "both parties are honest and open." (Dept. Ex. 8)

Respondent testified at trial that during this meeting, he started to feel that there might be more to the dispute than he originally realized. Respondent decided it would be best for him to remove himself from the situation, and this was, in fact, their final meeting. (Tr. 197-98)

After carefully reviewing these exhibits, in conjunction with the testimony at trial, I am not persuaded that Respondent was acting as an agent for the PRC. Indeed, Lieutenant Cutter testified that there was no evidence that Respondent was even aware that Sun was working on

behalf of the government of the PRC until the issue was discussed during the FBI interviews afterward. (Tr. 168) The record is devoid of sufficient evidence to support a finding that Respondent was acting “subject to the direction or control of a foreign government.” Although Respondent was brought into the dispute by Sun, the hearsay evidence only established that Respondent functioned as an intermediary between the two sides, never pressuring or threatening [REDACTED] to do Sun’s bidding.

Taken as a whole, the record was insufficient to prove, by a preponderance of the credible evidence, that Respondent acted as an agent for the government of the PRC, or that he conspired to do so. As such, there was no need for him to notify the Attorney General’s Office. Accordingly, I find Respondent Not Guilty of Specifications 1 and 2.

Specification 3 (False statements)

Specification 3 charges Respondent with intentionally making false statements to the FBI during his interviews on April 29, 2021 and September 2, 2021. Since DAO also did not serve and file this specification in a timely manner, they must prove each of the elements of the relevant United States Code provision. Specifically, the evidence must establish that Respondent knowingly and willfully made materially false statements when questioned by the FBI, an agency within the Executive Branch, regarding their Operation Fox Hunt investigation. (18 U.S.C. § 1001)

After reviewing the record in its entirety, I find that during both interviews there were multiple times where Respondent deliberately gave answers that he knew to be untrue in response to questions regarding [REDACTED], her dispute with Sun, and Respondent’s role in the matter. For example, at the first interview on April 29, 2021, Respondent was told that during

their investigation into Operation Fox Hunt, the name "████████" came up in █████'s contacts, and the agents asked Respondent who she was. Respondent answered that she was a woman he met at an association event. He added, "I'm not really communicating with her. But we say hi or whatever on WeChat from time to time. New Years, we say 'Happy New Year.' Stuff like that." (Dept. Ex. 9A at 50-51) In light of the evidence that Respondent had extensive dealings with █████ during the course of her dispute with Sun, I find this response to have been an egregious understatement of the truth, deliberately designed to distance himself from █████ and the FBI investigation. Although later in the interview Respondent was more forthcoming regarding his interactions with █████, that happened only after he was confronted with more targeted questions that indicated the FBI already was aware of Respondent's involvement. (Dept. Ex. 9A at 53, 77, 84-85)

Similarly, when asked what kind of contact he had with █████ after their initial meeting, Respondent answered that she "was asking him police related things," such as dealing with scam phone calls and matters of that nature. (Dept. Ex. 9A at 57) This response dramatically misstated the true nature of their extensive contacts. Again, Respondent only corrected this untrue answer after the FBI agents made reference to her interactions with █████ and Sun and the possibility of corruption. (Dept. Ex. 9A at 58-59, 77, 79; Dept. Ex. 10A at 21-23, 39, 58-61)

When Respondent was specifically questioned about how he first met █████ on December 1, 2019, and asked whether he knew in advance that the purpose of the meeting was to have █████ and Sun discuss their dispute, with Respondent, a police officer, present as well. Respondent answered, "No, actually. No." (Dept. 9A at 60) Later, Respondent was asked, "But you didn't know this woman would be here?" He answered, "Right, right." The agent asked,

"They never said, 'Hey, we got this woman we want you to help us with?'" Respondent answered. "No." The agent continued, "So you were blindsided?" Respondent replied, "Kind of. Yeah, kind of." (Dept. Ex. 9A at 88-89) In light of the evidence that Respondent was the one who, at Sun's request, specifically asked [REDACTED] by phone to come to the restaurant to discuss the property dispute, these answers by Respondent were completely untrue. (Dept. Ex. 3)

Respondent continued with this false narrative at the second FBI interview on September 25, 2021. When asked how [REDACTED] was invited to the December 1, 2019 meeting, Respondent answered that she was invited through [REDACTED], or possibly someone from the same community association. Respondent then stated, "I was never told that she would be there." He also denied that he called [REDACTED] on the phone before they met. The agent suggested to Respondent that since [REDACTED] had not personally met [REDACTED] before that date, it made no sense that he was the one who invited her. The agent also pointedly asked Respondent whether he used Sun's phone to call [REDACTED]. It was only then, after he had reason to believe that his questioners were aware he was not being truthful, that Respondent changed his story, and conceded that Sun did pass Respondent the phone to speak to [REDACTED], that he did identify himself to her as a police officer, and that he invited her to the restaurant. This statement was completely contrary to his earlier statements in both interviews. (Dept. Ex. 10A at 25-29)

At trial, Respondent denied that his answers were intentionally false. He claimed that he initially could not recall all of the relevant details, and when he did remember later in the interviews he clarified his answers. (Tr. 200-11) After carefully reviewing the two interviews, I reject Respondent's explanation as implausible and illogical. His interactions with [REDACTED] and Sun were extensive and memorable, and not likely to have been forgotten by Respondent. The more plausible explanation for his false statements was that Respondent was deliberately

attempting to downplay his connections to [REDACTED] and Sun, in order to minimize the chance of his being implicated in wrongdoing. His untrue answers involved significant facts, which were material and relevant to the FBI's investigation into Operation Fox Hunt. Accordingly, I find Respondent Guilty of Specification 3.

Specification 4 (Official Misconduct)

Specification 4 charges Respondent with committing official misconduct, in that he failed to take police action on behalf of [REDACTED]. Since DAO also did not serve and file this charge within the statute of limitations, they have the burden of proving all of the elements of "Official Misconduct," including that Respondent acted "with intent to benefit himself or deprive another person of a benefit." (NY Penal Law § 195.00)

DAO again argues that Respondent intended to benefit himself by securing a business relationship with Sun, and that his failure to take law enforcement action on [REDACTED]'s behalf was motivated by that interest. However, as discussed above with respect to Specifications 1 and 2, the possibility of a joint business was merely conjecture, a preliminary discussion without any real understanding that he and Sun were actually going into business together at some date in the future. I am not persuaded by the credible evidence that Respondent failed to take police action on [REDACTED]'s behalf in order to benefit himself, or to deprive another of a benefit. Accordingly, I find Respondent Not Guilty of Specification 4.

Specification 5 (Failure to report)

Specification 5 charges Respondent with failing to report to the Department that he was wrongfully associating with Sun as part of the FBI's Operation Fox Hunt investigation. Section

207-21 of the Patrol Guide states that all members of service "have an absolute duty to report any corruption or other misconduct, or allegation of corruption or other misconduct, of which they become aware."

At his first interview with the FBI on April 29, 2021, Respondent was questioned regarding his interactions with [REDACTED] and Sun in connection with their dispute. During that meeting, Respondent was made aware of the Operation Fox Hunt investigation, though it was not clear from that meeting that he, himself, was a target of that investigation. However, at his second FBI interview on September 25, 2021, Respondent was more directly confronted regarding his version of events, and his role in the matter. Indeed, by the conclusion of the interview, the FBI agents suggested that he should probably obtain defense counsel for advice moving forward. (Dept. Ex. 10A at 77-79)

At that point, it was incumbent upon Respondent to notify the Department regarding his involvement in the investigation. However, Respondent did not make the required notification until more than two years later, during his first interview with IAB on November 15, 2023. Accordingly, I find Respondent Guilty of Specification 5.

PENALTY

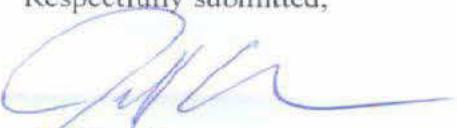
In order to determine an appropriate penalty, this tribunal, guided by the Department's Disciplinary System Penalty Guidelines, considered all relevant facts and circumstances, including potential aggravating and mitigating factors established in the record. Respondent's employment history also was examined. See 38 RCNY § 15-07. Information from his personnel record that was considered in making this penalty recommendation is contained in an attached memorandum. Respondent has no formal disciplinary record.

Respondent, who was appointed to the Department on January 20, 2004, has been found guilty of two specifications in this matter, the more serious of which is the charge of knowingly making materially false statements to the FBI. He then compounded the situation by failing to notify the Department regarding what had transpired. DAO recommends a penalty of Termination, while counsel for Respondent asks that Respondent be permitted to retire with his full pension.

Although Respondent has been found not guilty on the two charges related to being an agent for a foreign government, the false statements he made to the FBI are extremely troubling. After being made aware that the agents were investigating illegal activities on behalf of a foreign government in connection with the Operation Fox Hunt initiative, Respondent gave multiple deliberately false answers regarding how he came to be involved with Huang and Sun. As discussed above, Respondent provided an extended false narrative, trying to distance himself from the matter under investigation. In doing so, he disrupted the fact-finding process in a serious federal investigation, and there must be appropriate accountability.

Taking into account the totality of the facts and circumstances in this matter, I recommend a penalty of Termination.

Respectfully submitted,



Jeff S. Adler
Assistant Deputy Commissioner Trials

APPROVED



FEB 16 2024
EDWARD A. CABAN
POLICE COMMISSIONER



POLICE DEPARTMENT CITY OF NEW YORK

From: Assistant Deputy Commissioner – Trials
To: Police Commissioner
Subject: SUMMARY OF EMPLOYMENT RECORD
LIEUTENANT STEVEN LI
TAX REGISTRY NO. 933930
DISCIPLINARY CASE NO. 2023-29580

Respondent was appointed to the Department on January 20, 2004. On his three most recent annual performance evaluations, he twice received 4.5 ratings of "Extremely Competent/Highly Competent" for 2021 and 2022, and received a 4.0 rating of "Highly Competent" for 2023. Respondent has been awarded one medal for Excellent Police Duty.

Respondent has no formal disciplinary history. In connection with the instant matter, he was suspended without pay on January 11, 2024, and remains suspended to date. Additionally, he was placed on Level 1 Discipline Monitoring in May 2022; monitoring remains ongoing.

For your consideration.

A handwritten signature in blue ink, appearing to read "Jeff S. Adler".

Jeff S. Adler
Assistant Deputy Commissioner Trials